

REMARKS

Claims 1-15 are pending in the application. Claims 1-15 stand rejected. Claims 1, 4, 8, 11 and 13 have been amended. No new matter has been added. Claims 2-3, 5-7 and 9-10 have been cancelled.

The examiner has objected to the specification as including informalities. More specifically, the examiner contends that claim 5 should depend from claim 1 and not claim 2 as specified and that claims 5 and 6 are identical.

Applicant, through his attorney, wishes to thank the examiner for his observation with regard to claims 5 and 6. In reply, applicant has requested that claims 5 and 6 be cancelled and respectfully submits that the examiner's objection is no longer relevant. Applicant respectfully requests that the objection be withdrawn.

Claims 1, 2, 4, 8, 9 and 13-15 stand rejected under 35 U.S.C. §102(e) as being anticipated by USPPA No. US 2001/0047431 to Eytchison. It is the examiner's position that Eytchison discloses each and every element of the present invention.

Applicant respectfully disagrees with, and explicitly traverses, the examiner's reason for rejecting the claim. However, in order to advance the prosecution of this matter, applicant has elected to amend claim 1. More specifically, claim 1 has been amended to include the subject matter of dependent claims 2, 3, 6 and 7.

It is well recognized that to constitute a rejection pursuant to 35 USC §102, i.e., anticipation, all material elements recited in a claim must be found in one unit of prior art. As will be shown, Eytchison fails to disclose all the elements are recited in amended claim 1.

Eytchison discloses a bridge solution that facilitates interoperability between HAVi and VHN networks. The bridge includes a translator that translates messages via a protocol translator coupled to the two networks. The protocol translator "convert[s] HAVi messages into XML messages and convert[s] XML messaging into HAVi messages." (see paragraph [0057]). Thus, the device of Eytchison interprets the

source of the message and requires translation of every message for transmission to the other network. Eytchison fails to disclose a system that "selectively translate[s] a first set of communications between the Web server and the first network, and to pass a second set of communications between the Web server and the first network without translation," as is recited in amended claim 1.

Accordingly, Eytchison can not be said to anticipate the present invention as Eytchison does not disclose each and every element recited. Applicant submits that claim 1 is patently distinguishable from the Eytchison device. Applicant, thus, respectfully requests entry of the amendment, withdrawal of the rejection, and allowance of the claim.

With regard to independent claims 8 and 13, the examiner rejected these claims reciting the same reason used to reject claim 1. However, claims 8 and 13 each have been amended to recite the element "selectively translate a first set of communications between the Web server and the first network, and to pass a second set of communications between the Web server and the first network without translation," which is recited in claim 1. Accordingly, for the same remarks made with regard to claim 1, claims 8 and 13 also include subject matter not disclosed by Eytchison and, thus, are patently distinguishable from the Eytchison device.

Applicant submits that the examiner's rejection has been overcome and can no longer be sustained. Applicant respectfully requests entry of the amendment, withdrawal of the rejection, and allowance of claims 8 and 13.

With regard to claims 14-15, these claims depend from claim 13, which has been shown to be patently distinguishable and, hence, allowable over the cited reference. Accordingly, claims 14-15 are also allowable by virtue of their dependency upon an allowable base claim.

With regard to claims 2 and 9, the applicant has requested that these claims be cancelled. Accordingly, applicant respectfully submits that the examiner's rejection of these claims is not longer relevant and requests withdrawal of the rejection.

Claims 3, 5-7 and 10-12 stand rejected pursuant to 35 USC §103 as being unpatentable over Eytchison in view of USP 6,523,696 to Saito. With regard to claim 3, it is the examiner's position that "the reference [Eytchison] teaches the interface [and] ... Saito teaches IP devices located on the non-IP network [and] ... these devices can have their own global IP addresses ... such that communications to these devices coming from IP network is not translated because it does not need to be translated (col. 19, lines 6-26)... Therefore it would have be obvious ... to combine Eytchison with Saito to modify its VBCM web client such that IP devices located in the non-IP network and having their global IP address gets their message directly from the IP network ... as taught by Saito. This allows the IP devices location in the Non-IP network as shown by Saito to communicate with other IP devices without being interfered [with] by the interface."

With regard to claims 5, 6, 7, 10 and 12, the examiner states a similar reason for rejecting these claims as stated in rejecting claim 3.

Applicant respectfully disagrees with, and explicitly traverses the examiner's reasons for rejecting the claims. A claimed invention is prima facie obvious when three basic criteria are met. First, there must be some suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings therein. Second, there must be a reasonable expectation of success. And, third, the prior art reference or combined references must teach or suggest **all** the claim limitations.

Applicant would first note that applicant has requested that claim 3 be cancelled and, thus, the rejection is not longer relevant. However, the subject matter of claim 3 has been incorporated into claim 1 and applicant, thus, will address the rejection as it now applies to amended claim 1.

Saito discloses a system for realizing a uniform service between networks. The communication control device between the networks has a collecting unit for collecting service information according to a first protocol dependent on the first network and a notifying unit for notifying the service information to a device connected with a second network according to a second protocol not depending on the first network. Saito teaches that devices on the networks may have a "private IP access (when the public

network is ISDN and the like rather than Internet) or global IP addresses (when the public network is Internet)" (see col. 19, lines 17-20).

As noted above, Eytchison discloses a system that translates every message transmitted from one network to the other. Eytchison does not disclose or suggest "to selectively translate a first set of communications between the Web browser and the first network, and to pass a second set of communications between the Web browser and the first network without translation," as is claimed.

Saito teaches that when there are IP devices on the non-IP network, access to the IP devices may be obtained by knowing a global address of the IP devices. However, this is a specific configuration taught by Saito that Saito depends upon to not perform normally required translation from one network to another. This specific teaching is not appropriate when there are only non-IP devices on the non-IP network. Accordingly, one skilled in the art would not look to Saito to teach or suggest selective translation when transferring messages from one network to another as Saito fails to teach selective translation of messages when the non-IP network does not include IP devices.

Furthermore, even if the teachings of Eytchison and Saito can be combined, as suggested by the examiner, the combined device would not include all the elements of the present invention. The device of Eytchison teaches translation of all the communications between networks and includes no discussion or teaching to include mapping or identification of devices that do not require translation or to distinguish IP and non-IP devices. Accordingly, the combined device would not render obvious the present invention because the combined device would not include all the elements of the present invention.

With regard to claims 5-7 and 10-12, applicant has requested that these claims be cancelled. Accordingly, the examiner's rejection of these claims is no longer relevant.

Having shown that the device suggested by the examiner does not include all the elements of the instant invention claimed, applicant submits that the examiner's

rejections of the claims have been overcome and can no longer be sustained. Applicant respectfully requests withdrawal of the rejection and allowance of the claims.

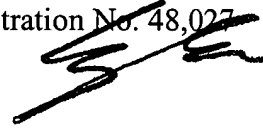
Having addressed the examiner's objections and rejections under 35 USC §§ 102, 103, applicant submits that for the amendments and remarks made herein the reasons for the examiner's rejections have been overcome and can no longer be sustained. Applicant respectfully requests reconsideration and withdrawal of the rejections and that a Notice of Allowance be issued.

Should any unresolved issues remain that the examiner believes may be resolved via a telephone call, the examiner is invited to call Applicant's attorney at the telephone number below.

No fees are believed necessary for the filing of this Amendment and Response. However, the Commissioner for Patents is hereby authorized to charge any additional fees, including fees for extensions of time or credit any excess payment that may be associated with this communication to deposit account on file.

Respectfully submitted,

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Date: June 23, 2004

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 6/23/04
(Signature and Date)